

**Iowa Department of Natural Resource (IDNR)  
New Source Review (NSR) Reform Rules Workgroup  
Meeting Minutes  
March 30 and 31, 2004**

**Background:**

EPA administrative rules changing (reforming) certain aspects of the NSR program were published on December 31, 2002. The rules include provisions for:

- baseline emissions determination,
- actual to projected actual methodology,
- plant wide applicability limits, and
- pollution control projects, and clean units.

IDNR has until January 2, 2006 to adopt the EPA rules and to submit any revisions to EPA to include into IDNR's State Implementation Plan (SIP). The SIP governs how IDNR will ensure adherence to federal air quality laws.

The Work Group is being asked to offer recommendations and suggest alternative methods or approaches for adopting EPA reform rules. IDNR would like recommendations to be provided by fall 2004 to allow for adequate time to complete the state rulemaking process. The state rule-making process takes approximately nine to twelve months to allow for the required posting, review, and public comment period.

All states must adopt the EPA rule revisions. States cannot selectively pick and choose certain revisions to adopt or refuse. However, States may clarify or simplify some provisions and special features of the rules during the state rule adoption process.

**March 30 to March 31, 2004 activities:**

To kick off the Work Group, Gary McCutchen from RTP Environmental provided a workshop on the EPA's NSR reform rules. (A printout of Gary's overview slides will be provided at the next meeting.)

The Work Group determined that the most effective way to facilitate work on the rule is to form the following three subgroups:

- 1) Plant wide Applicability Limits (PALs)
- 2) Baseline Actual Emissions (BAE) - - this group includes actual to projected actual and netting - - and
- 3) Pollution Control Projects (PCP)/Clean Units

Sherry Timmins from Iowa Department of Economic Development (IDED) will be facilitating the Work Group. Sherry will work with the subgroups and the IDNR senior engineer assigned to each subgroup. These staff will provide technical support and guidance throughout the Work Group process.

Work Group members selected the subgroup that they would like to participate on. The participants' selections for the subgroups are reflected on the attached spreadsheet.

Thirteen individuals are still unassigned and need to contact Jim McGraw to preference a subgroup.

Each subgroup will have a group leader responsible helping to coordinate the activities and discussions of the subgroup and working with the facilitator. A subgroup leader will need to be selected at the next meeting for the BAE and PCP subgroups. Rich Stephens, ADM, has agreed to act as the leader for the PALs subgroup.

Due to issues in the reform rules that are unique to the utilities, workgroup members from the utilities may decide to form a fourth subgroup if the need arises.

### **Homework**

#### ***Preliminary list of issues***

- ✓ Air Quality Bureau (AQB) staff are putting together a preliminary list of issues/concerns related to the reform rules for each of the three subgroups. (The preliminary issue list will be available online sometime during the week of April 26, 2004.)
- ✓ Work Group members should review the preliminary list and be prepared to discuss it and any additional issues/concerns at the next meeting.

#### ***Other review items***

- ✓ Work Group members are encouraged to review the portions of EPA's reform rule that were included with the work shop materials, and to examine the "menu of options" provided by STAPPA/ALAPCO (State and Territorial Air Pollution Program Administrators and Association of Local Air Pollution Control Officials, respectively.) A link to the "menu of options" can be found on the Work Group's site.

#### ***Subgroup preference***

Contact Jim to identify your preference for working with a subgroup.

#### ***Scheduling***

- ✓ Please bring your calendars to assist your fellow participants in scheduling future subgroup meetings.

### **Next Meeting**

The next Work Group meeting will be held on May 3, 2004, in the Ingram Room of the AQB from 1:00 to 4:30 pm. All workgroup members will meet together for the first hour. Members will split into their assigned subgroups in an AQB conference room after an overview in the Ingram Room. An agenda for the May 3 meeting is attached.

Any concerns/questions/comments: Please contact Sherry Timmins at 515/242-4901 or Jim McGraw at 515/242-5167.

**Information and updates related to the workgroup can be found at [www.iowacleanair.com](http://www.iowacleanair.com). Select the “NSR Reform Workgroup” link under the Air Quality heading.**

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